

**EXHIBIT A**

Sullivan Declaration

UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF NEW YORK

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In re:

The Roman Catholic Diocese of  
Ogdensburg, New York,

Debtor.

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) Case No. 23-60507 (PGR)  
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) Chapter 11  
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**DECLARATION OF CHARLES J. SULLIVAN, ESQ. IN SUPPORT OF  
OMNIBUS APPLICATION FOR ENTRY OF AN ORDER REDUCING  
TIME FOR NOTICE OF THE DIOCESE'S FIRST DAY MOTIONS**

I, Charles J. Sullivan, do hereby declare, under penalty of perjury, that:

1. I am an attorney duly licensed to practice law in the State of New York and before this Court and am a member for the law firm of Bond, Schoeneck & King, PLLC, proposed counsel to The Roman Catholic Diocese of Ogdensburg, New York (the "Diocese"). As such, I am fully familiar with the facts and circumstances set forth herein.

2. I make this Declaration in support of the Diocese's *Omnibus Application for Entry of an Order Reducing Time for Notice of the Diocese's First Day Motions* (the "Application"),<sup>1</sup> filed with the Court on July 17, 2023.

3. On July 17, 2023, the Debtor will file the following motions (the "First Day Motions"):

(i) Motion for Entry of an Order Authorizing the Diocese to File Portions of Schedule F, the Statement of Financial Affairs, the Master Creditor Mailing Matrix, Certain Certificates of Service and Other Pleadings and Documents Under Seal (the "Motion to Seal");

(ii) Motion for Entry of an Order Pursuant to Bankruptcy Rules 1007(c) and 9006(b)(1) Extending Time to File Schedules of Assets and Liabilities, Schedules of Current Income and Expenditures, Schedules of Executory Contracts and Unexpired Leases and Statements of Financial Affairs (the "Motion to Extend Time to File Schedules");

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<sup>1</sup> Capitalized terms used but not otherwise defined herein shall have the meanings set forth in the Application.

- (iii) Motion for Entry of Interim and Final Orders (A) Authorizing the Use of Cash Collateral, and (B) Granting Adequate Protection (the “Cash Collateral Motion”);
- (iv) Motion for Entry of Interim and Final Orders Authorizing the Diocese to (A) Pay Prepetition Compensation and Reimbursable Employee Expenses, (B) Pay and Honor Medical and Other Benefits and (C) Continue Employee Benefit Programs (the “Wages Motion”);
- (v) Motion for Entry of Interim and Final Orders Authorizing Payment of Prepetition Taxes and Regulatory Fees (the “Taxes Motion”);
- (vi) Motion for Entry of Interim and Final Orders (A) Prohibiting Utility Companies from Altering, Refusing or Discontinuing Service on Account of Prepetition Amounts Due, (B) Determining Adequate Assurance of Payment for Post-Petition Utility Services Under 11 U.S.C. § 366, and (C) Establishing Procedures for Determining Adequate Assurance of Payment (the “Utilities Motion”);
- (vii) Motion for Interim and Final Orders (A) Authorizing, but Not Directing, the Diocese to (i) Continue Using Existing Bank Accounts, Banking Practices and Business Forms, (ii) Maintain Investment Accounts and Practices, and (iii) Continue Using Credit Cards, and (B) Granting Limited Relief From the Requirements of Bankruptcy Code Section 345(b) (the “Cash Management Motion”);
- (viii) Motion for Interim and Final Orders Authorizing, but Not Directing, the Diocese to Continue to Administer the Deposit and Loan Fund and Diocesan Trust Fund in the Ordinary Course of Business and Consistent with Past Practices (the “Related Party Liquidity Motion”);
- (ix) Motion for Entry of Interim and Final Orders (I) Authorizing the Continued Maintenance of the Diocese’s Insurance Program; and (II) Authorizing the Payment of Obligations in Respect Thereof (the “Insurance Motion”);
- (x) Motion for Entry of an Order Pursuant to 11 U.S.C. §§105(a) and 362(a) Confirming the Applicability of the Automatic Stay (the “Stay Confirmation Motion”);
- (xi) Application for Entry of an Order Authorizing the Appointment of Stretto, Inc. as Claims and Noticing Agent Effective as the Petition Date (the “Application to Employ Claims and Noticing Agent”); and
- (xii) Application for Entry of an Order Authorizing the Appointment of Stretto, Inc. as Administrative Advisor Effective as of the Petition Date (the “Application to Employ Administrative Advisor”).

4. Local Rule 9013-1(e) requires that notice of a motion be provided 21 days prior to the scheduled hearing date.

5. Bankruptcy Rule 9006(c)(1) provides that “when an act is required or allowed to be done at or within a specified time by these rules or by a notice given thereunder or by order of court, the court for cause shown may in its discretion with or without motion or notice order the period reduced.”

6. Typically, hearings to consider first day motions are held on the petition date or the next day. In this case, the Diocese filed its petition for relief on July 17, 2023. The Court’s next available regularly scheduled chapter 11 motion calendar date is July 25, 2023 at 1:00 p.m. (prevailing Eastern Time). The relief requested in the First Day Motions is immediately necessary to ensure the uninterrupted operation of the Diocese’s business and to prevent immediate and irreparable harm.

7. Under the circumstances presented, cause exists for reducing the notice period and scheduling a hearing to consider the relief requested in the First Day Motions for July 17, 2023, in Utica, New York. An order reducing time for the hearings to consider the First Day Motions will benefit the Diocese’s estate by ensuring the continued operation of the Diocese’s business and preserving assets of its bankruptcy estate. Accordingly, for the reasons set forth in this Declaration and the First Day Motions, the Diocese respectfully requests that the Court issue an order reducing the notice period and scheduling a hearing to consider the First Day Motions for July 17, 2023 at 10:00 a.m. (prevailing Eastern Time).

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge, information, and belief.

Executed on July 17, 2023

By: /s/ Charles J. Sullivan  
Charles J. Sullivan, Esq.